

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

DEBRA-ANN WELLMAN,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 05-280-SLR
)	
THE DOW CHEMICAL COMPANY,)	
)	
Defendant.)	

STIPULATION AND ORDER

The parties, by and through the undersigned counsel, subject to the approval of the Court, hereby stipulate and agree as follows:

1. The Case Scheduling Order in this action is hereby amended to extend the date for the completion of discovery to and including January 30, 2007.

2. The date for filing case dispositive motions is hereby extended to and including February 28, 2007. Briefing shall be in accordance with the Local Rules unless otherwise agreed by the parties and approved by the Court.

3. A trial date will be set by the Court after the Court's ruling on case dispositive motions.

4. Plaintiff shall fully cooperate with discovery directed to her by Defendant, including but not limited to the following:

a. She agrees to attend her deposition upon Notice as set forth in the Local Rules of the U.S. District Court for the District of Delaware;

b. She agrees to file full and complete answers to Defendant's First Set of Interrogatories, First Requests for Production, and Second Set of Interrogatories on or before December 15, 2006.

5. Any failure on the part of the Plaintiff to comply with this Stipulation and Order shall be treated as a failure to comply with an Order compelling discovery under Federal Rules of Civil Procedure 37(b)(2) subjecting Plaintiff to sanctions including in the Court's discretion dismissal of this action and/or an award of attorneys fees.

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The Dow Chemical Company

SO ORDERED this _____ day of _____, 2006.

The Honorable Sue L. Robinson
United States District Court Judge

Dated: November 21, 2006